

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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In the Matter of the Application of	:
	:
TIDEWATER INVESTMENT SRL <i>et al.</i> ,	:
	:
Petitioners and Arbitration Award Creditors,	:
	:
For Recognition and Enforcement of an Arbitration Award	: No. 15 CV 1960 (ALC)
	:
- against -	:
	:
BOLIVARIAN REPUBLIC OF VENEZUELA	:
	:
Respondent and Arbitration Award Debtor.	:
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NOTICE OF MOTION TO VACATE *EX PARTE* JUDGMENT

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law and the Declaration of Joseph D. Pizzurro, dated March 23, 2015, with the exhibits attached thereto, the Defendant Bolivarian Republic of Venezuela (“Republic”), by its undersigned counsel, will move this Court, at the United States Courthouse located at 40 Foley Square, New York, New York, on a date and time to be determined by the Court, for entry of an Order (1) vacating the Order and Judgment, dated March 16, 2015, as void under Rule 60(b) of the Federal Rules of Civil Procedure for want of subject matter and personal jurisdiction; (2) vacating the award of 4.5% post-judgment interest in the Judgment; and (3) granting such other and further relief as may be just and proper.

By making this Motion, the Republic specifically reserves all of its rights and does not waive any of its defenses or its sovereign immunity.

Dated: New York, New York
March 23, 2015,

Respectfully submitted,

CURTIS, MALLET-PREVOST,
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